

33

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES

Plaintiff

: Civil Action No.1:CV-01-1015

: Judge Kane

v.

YORK COUNTY POLICE DEPT.,

ET AL.,

Defendants

FILED  
SCRANTON

DEC 13 2001

PER                       
DEPUTY CLERK

**PLAINTIFF'S FIRST SET OF**  
**INTERROGATORIES**

In accordance with Rule 33 of the Federal Rules of Civil Procedure, plaintiff requests that Defendant YORK COUNTY POLICE DEPT., ET AL, answer the following interrogatories separately and fully in writing under oath, and that the answers be signed by the person making them and be served on plaintiffs within 45 days of service hereof.

In responding to these interrogatories, furnish all information which is available to you, including information in the possession of your attorneys or

investigators for your attorneys, and not merely information known of your own personal knowledge.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes throughout this proceeding.

1. What is your full name and address?
2. On January 10, 2001 were you employed by the Pennsylvania State Attorney General Office.
3. On January 10, 2001, were you on duty as a Police officer/Agent at the Mail Box Etc. 2536 Eastern Blvd. York PA. located at the Kingston Square Center;
4. If yes.
  - (a) What was your reasons or purpose to be at that location?
  - (a) to what section or division were you assigned?

(c ) What is the full names, capacity and last known business and residence address of the individual who was your immediate superior?

(d) Were your superior present on January 10, 2001, at the Mail Box Etc. Kingston Square Center?

(e) If yes, what was their purpose for being at that location?

(f) At what time of the day did you go on duty?

(g) At what time of the day did you go off duty?

(h) List all the names and occupation of all individual that was present at the Mail Box Etc. at the Kingston Square shopping Center on January 10, 2001, including FBI Agent, District Attorney, YCPD officers and detective, and Agent from the Office of the attorney General.

5. Did you have any encounter or contact with Plaintiff Tyrone P. James on January 10, 2001?

6. If yes, state specifically and in detail, as accurately as you can remember, the exact sequence of events that occurred subsequent to your initial encounter or contact with the Plaintiff on that date.

7. Did you at any time on January 10, 2001 or on any other date; trampled upon, arrest, beat, strike, kick, spray with MACE, or with any other chemical, or other-wise abuse Plaintiff?

8. If yes, were any other persons involved?
9. Was any written report made of the details of the conduct in interrogatories number- 7 ?
10. If yes, state:
  - (a) The name, badge or identification number, and present address of the persons who prepared each such report;
  - (b) the name, badge or identification number, and present address of the person or persons for whom each such report was prepared;
  - (c ) The date, time, and place where each such report was prepared;
  - (d) The name, badge or identification number, and present address of the present custodian of each such report.
11. If the answer to question 9 is yes, was each such report written or reduced to writing?
12. If yes, attach a copy of each of each such written report to your answer to these interrogatories.
13. State the names and address or otherwise identify and locate any person or persons who, to your knowledge, or to the knowledge of your agents and attorneys, purport to have knowledge of facts relevant to the conduct described in these interrogatories.

14. Do you, your attorneys, or any person employed by you or your attorneys, have possession or know of the existence of any books, records, reports made in the ordinary course of business, other printed or documentary material, or photographs, drawings, or documents, or other tangible objects that are relevant to the conduct described in these interrogatories?

15. If yes, state:

(a) The name and description of each such item;

(b) The name and address of each person who made, prepared or took each such item;

(c) the name and address of the present custodian of each such item;

(d) The date, time and place where each such item was made, prepared or taken;

(e) The method by and purpose for which each such item was made, prepared or taken;

(f) The manner in which each such item is relevant to the conduct described in these interrogatories.

16. If the answer to question 14 is yes, do you have knowledge of any item mentioned there being altered in any manner, lost or destroyed?

17. Do you, or any Agent of the Office of the Attorney General, York City Police Department, York County Drug Task Force, Federal Bureau of

Investigations, York County Prison Correction Officer(s), and/or staff having any knowledge, or who is/was aware of any and all information concerning said incident?

18. If yes, to question 17, state the circumstances and reasons pertaining to the violation of the Plaintiff's rights.

Dated: December 9, 2001.

By, Tyrone James  
(signatures)

Tyrone P. James  
3400 Concord Rd.  
York, PA 17402